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From: Jessica Ludy [\[mailto:jludy@americanrivers.org\]](mailto:jludy@americanrivers.org)

Sent: Friday, July 15, 2011 4:56 PM

To: Nichol, Eric@DeltaCouncil

Cc: John Cain; Grindstaff, Joe@DeltaCouncil

Subject: Table 7-1 Suggested Modification

Hi Eric,

Attached is our suggested modification to table 7-1 that I mentioned in public comment at the last meeting. This table addresses Urban use with more specificity taking flood depth and land below sea-level into consideration. Essentially table 7-2 should "fit into" the "Urban" box of table 7-1. Please let me know if you have any questions or if that is unclear, I'd be happy to talk with you about it.

Thank you.

Best,

Jessica Ludy

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The **Urban Areas** classification in Table 7-1 should be modified to include or refer to Table 7-2 below in order to protect public safety and economic sustainability in the Delta.

**Table 7-2**

	<b>Urban Area</b>				
	Depth of inundation less than 3 feet	Depth of inundation between 3-6 feet	Depth of inundation greater than 6 feet	Major subdivision <sup>1</sup> on undeveloped farmland	Land below Sea-level <sup>2</sup>
<b>Class 1</b>	Not acceptable	Not acceptable	Not acceptable	Not acceptable	Not acceptable
<b>Class 2</b>	Not acceptable	Not acceptable	Not acceptable	Not acceptable	Not acceptable
<b>Class 3</b>	Not acceptable	Not acceptable	Not acceptable	Not acceptable	Not acceptable
<b>Class 4</b>	Not acceptable	Not acceptable	Not acceptable	Not acceptable	Not acceptable
<b>Class 5</b>	Acceptable	Acceptable where building code updates have been adopted (elevating above 3 feet) <sup>3,4</sup>	Acceptable only for residential + commercial uses on second floor or above	Not acceptable	Not acceptable

1. Major subdivisions in most California counties are defined as 4 lots or more.
2. Sea-level defined as the elevation of mean high tide. These areas will not drain out, making them prone to catastrophic damages. Considering sea level rise projections of 40-55 inches (page 1 Delta Plan Draft 4), these areas will be at even greater risk in the future.
3. SB 5 required building codes standards updates in “areas protected by Central Valley Flood Protection Plan facilities where flood levels for the 200-year flood are anticipated to exceed three feet.”
4. Most flood deaths (74%) during Hurricane Katrina occurred in single story residential structures elevated 3 feet or less. (Boyd, Ezra. 2011. “Fatalities due to Hurricane Katrina’s Impacts in Louisiana.” Available: <http://etd.lsu.edu/docs/available/etd-06092011-084046/>)